REQUEST FOR ADDITIONAL INFORMATION
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
MONTICELLO SLRA SAFETY REVIEW
NORTHERN STATES POWER COMPANY
MONTICELLO, UNIT 1
DOCKET NO. 05000263
ISSUE DATE: 7/19/2023

RAI 3.5.2.2.1.5-1

Regulatory Basis:

Title 10 of the *Code of Federal Regulations (CFR)* Section 54.21(a)(3) requires the applicant to demonstrate that the effects of aging for structures and components in the scope of license renewal and subject to aging management review (AMR) will be adequately managed so that the intended function(s) will be maintained consistent with the current licensing basis (CLB) for the period of extended operation.

As described in the SRP-SLR, an applicant may demonstrate compliance with 10 CFR 54.21(a)(3) by referencing the GALL-SLR Report when evaluation of the matter in the GALL-SLR Report applies to the plant. SRP-SLR Section 3.1.2.4 states: “If the applicant identifies an exception to any of the program elements of the cited GALL-SLR Report AMP, the SLRA AMP should include a basis demonstrating how the criteria of 10 CFR 54.21(a)(3) would still be met. The reviewer should then confirm that the SLRA AMP with all exceptions would satisfy the criteria of 10 CFR 54.21(a)(3).”

The “parameters monitored or inspected” program element of GALL-SLR AMP XI.S1 “ASME Section XI, Subsection IWE” states, in part: “Steel, stainless steel (SS), and dissimilar metal weld pressure-retaining components that are subject to cyclic loading but have no CLB fatigue analysis (i.e., components covered by SRP-SLR Table 3.5-1, items 27 and 40, and corresponding GALL-SLR items; as applicable), are monitored for cracking.”

The “detection of aging effects” program element of GALL-SLR AMP XI.S1 states, in part:

"The requirements of ASME Code Section XI, Subsection IWE and 10 CFR 50.55a are supplemented to perform surface examination (or other applicable technique) in addition to visual examinations, to detect cracking in steel, SS, and dissimilar metal weld pressure-retaining components that are subject to cyclic loading but have no CLB fatigue analysis (i.e., components covered by SRP-SLR Table 3.5-1, items 27 and 40, and corresponding GALL-SLR items; as applicable to the plant)."

SRP-SLR Section 3.5.2.2.1.5 *Cumulative Fatigue Damage*, as modified by SLR-ISG-2021-03-STRUCTURES (ADAMS Accession No. ML20181A381), provides guidance for further evaluation of cumulative fatigue damage of containment pressure-retaining boundary components subject to cyclic loading but have no CLB fatigue analysis, and states in part:

"For the above-stated containment pressure-retaining components (corresponding to Table 3.5-1, Items 027 and 040) subject to cyclic loading for which no CLB fatigue analysis exists at

the time of an SLRA submittal, a plant-specific further evaluation may be performed to demonstrate that cracking due to cyclic loading is an aging effect that does not require aging management for the component. As one acceptable approach, the aging effect does not require aging management actions if the further evaluation demonstrates that the six criteria for cyclic loading in paragraph NE-3222.4(d) (NE-3221.5(d) in 1980 and later code editions), “Analysis for Cyclic Operation, Vessels Not Requiring Analysis for Cyclic Service,” of ASME Code, Section III, Division 1 (1974 edition or later edition incorporated by reference in 10 CFR 50.55a(a)(i)), that provide for a waiver from detailed fatigue analysis are satisfied for applicable component materials through the end of the subsequent period of extended operation. The option to perform a fatigue waiver analysis to address the aging effect of cracking due to cyclic loading, for specific containment metallic components, is in lieu of performing supplemental surface examinations…."

Background:

SLRA Section B.2.3.29 takes exception to the GALL-SLR AMP XI.S1 recommendations (stated in the regulatory basis) to monitor for cracking through supplemental surface examinations, and in the first bullet under “Exceptions to NUREG-2191” states in part:

*"…….*An *assessment* was performed to address the following design inputs for components materials comprising the primary containment that could be subject to cyclic loading but have no CLB fatigue analysis: (1) Atmospheric-to-operating pressure cycle; (2) Normal operation pressure fluctuation; (3)Temperature difference – startup and shutdown; (4) Temperature difference – normal operation; (5) Temperature difference – dissimilar metals; and (6) Mechanical loads.

The *assessment* concluded that the drywell shell, non-high temperature drywell penetrations, and penetration sleeves are subjected to a small amount of fatigue such that neither fatigue analysis *nor a fatigue waiver is required.* As such, cracking due to cyclic loading does not require aging management for drywell shell, non-high temperature drywell penetrations, and penetration sleeves.

MNGP does not monitor for cracking utilizing supplemental surface examinations except at accessible portions of certain steel and stainless-steel penetrations associated with high temperature systems. ……"

SLRA Section 3.5.2.2.1.5 “Cumulative Fatigue Damage” references the criteria in SRP-SLR Section 3.5.2.2.1.5, as modified by SLR-ISG-2021-03-STRUCTURES. SLRA Section 3.5.2.2.1.5 states, in part:

"An assessment was performed which concluded that the drywell shell and non-high temperature drywell penetrations, and penetration sleeves are subjected to a small amount of fatigue, therefore, fatigue analysis, or a fatigue waiver, for the drywell shell and drywell penetrations is not required. This assessment did not include drywell penetration bellows, which have fatigue analysis, and adapters of high temperature drywell mechanical penetrations."

Request:

1. For each of the drywell components for which the assessment was performed and credited to justify the exception(s) to GALL-SLR AMP XI.S1 taken in SLRA Section B.2.3.29 AMP, describe in sufficient technical detail the assessment, including cyclic loads and material inputs used, code edition, provisions, and criteria used/met with summary of results, that would demonstrate the acceptance criteria in SRP-SLR Section 3.5.2.2.1.5 (as modified by SLR-ISG-2021-03-STRUCTURES) were met to conclude that the aging effect of cracking due to cyclic loading does not require management.

2. Update the SLRA as necessary.

RAI 4.3.1-1

Regulatory Basis:

Pursuant to 10 CFR 54.21(c), the SLRA must include an evaluation of time-limited aging analyses (TLAAs). The applicant must demonstrate that (i) the analyses remain valid for the period of extended operation, (ii) the analyses have been projected to the end of the period of extended operation, or (iii) the effects of aging on the intended function(s) will be adequately managed for the period of extended operation.

Background:

SLRA Section 4.3.1 addresses the 80-year transient cycle projections. The SLRA section explains that the transient cycle projections are based on the cycle accumulation rates of the most recent 10-year evaluation period up to May 31, 2021 (i.e., the evaluation period of June 1, 2011, through May 31, 2021).

Issue:

However, the applicant did not clearly address why the cycle projections do not consider the full cycle accumulation rates observed since the start of the plant operation. The staff needs information on the technical basis of the applicant's approach that uses only the most recent 10-year cycle accumulation rates (e.g., the most recent 10 years of operation involve distinctive and stable cycle accumulation rates that are a better representation of the operational characteristics of the subsequent period of extended operation than the prior cycle accumulation rates would be).

The staff also noted that the "safety/relief valve lifts" transient has a total cycle number of 619 as of May 31, 2021, as described in SLRA Table 4.3.1-1. In comparison, the 80-year projected cycle number of this transient is only 699.

Considering that the operation of the plant started on September 30, 1970, the operation time period through the end of the cycle evaluation period (May 31, 2021) is approximately 51 years. The additional operating time period following May 31, 2021, through 80 years of operation is approximately 29 years (i.e., 80 - 51 years).

Based on the cycle numbers and operating time periods discussed above, the cycle accumulation rate of the "safety/relief valve lifts" transient for cycle projections is approximately

2.8 cycles/year (i.e., (699 – 619 cycles)/29 years) for the time period after May 31, 2021. In comparison, the previous full cycle accumulation rate since the start of the operation through May 31, 2021, is approximately 12.1 cycles/year (i.e., 619 cycles/51 years), which is significantly greater than the cycle accumulation rate used in the cycle projections (2.8 cycles/year).

Therefore, the staff needs clarification on the following items for the "safety/relief valve lifts" transient: (1) why the cycle accumulation rate used in cycle projections (2.8 cycles/year) is significantly lower than the full cycle accumulation rate (12.1 cycles/year) observed since the start of the operation through May 31, 2021; and (2) whether the most recent 10-year operation period up to May 31, 2021 represents the operating characteristics for the subsequent period of extended operation in terms of cycle calculations.

Request:

1. Describe the technical basis for the applicant's approach that uses the most recent 10-year cycle accumulation rates for cycle projections but does not consider the full cycle accumulation rates observed since the start of the operation.

2. Provide clarification on the following items for the "safety/relief valve lifts" transient: (1) why the cycle accumulation rate used in cycle projections is significantly lower than the full cycle accumulation rate observed since the start of the operation through May 31, 2021; and (2) whether the most recent 10-year operation time period up to May 31, 2021 represents the operating characteristics for the subsequent period of extended operation in terms of cycle calculations. For item (2) discussed above, if the most recent 10-year operation period does not represent the operating characteristics for the subsequent period of operation, explain why the cycle accumulation rate of the most recent 10-year operation time period is used in the cycle projections rather than the full cycle accumulation rate observed since the start of the plant operation. Update the SLRA if needed.

RAI 4.3.2-1

Regulatory Basis:

Pursuant to 10 CFR 54.21(c), the SLRA must include an evaluation of time-limited aging analyses (TLAAs). The applicant must demonstrate that (i) the analyses remain valid for the period of extended operation, (ii) the analyses have been projected to the end of the period of extended operation, or (iii) the effects of aging on the intended function(s) will be adequately managed for the period of extended operation.

Background:

SLRA Section 4.3.2 describes the time-limited aging analysis (TLAA) on ASME Code Section III, Class 1 fatigue waiver evaluations. SLRA Table 4.3.2-1 describes the numbers of transient cycles used in the existing fatigue waiver evaluations and the 80-year projected cycles used in the fatigue waiver TLAA. Specifically, SLRA Section 4.3.2 explains that the applicant used the 80-year projected transient cycles to confirm that the existing fatigue evaluations remain valid

for the subsequent period of extended operation for the following components: (1) main closure flange, (2) IRM/SRM dry tube, (3) power range detector assembly and (4) in-core detector assembly.

Issue:

However, SLRA Section 4.3.2 does not clearly discuss why the existing fatigue waiver evaluations remain valid for the subsequent period of the extended operation for the head cooling spray and instrumentation nozzles (N6A and N6B nozzles) and vent nozzle (N7 nozzle).

In addition, SLRA Table 4.3.1-1 indicates that the following transients are not listed in the updated safety analysis report (USAR) and, accordingly, USAR does not define a design cycle limit for these transients: (1) “sudden start” transient; (2) “hot standby with drain shutoff” transient; (3) “core spray injection” transient; and (4) “operating basis earthquake (OBE)” transient.

SLRA Table 4.3.1-1 also indicates that these transients have not occurred during the plant operation (as of May 31, 2021) and each of these transients is estimated to have one projected cycle for 80 years of operation. The staff needs clarification on whether these non-USAR-listed transients have an impact on the validity of the fatigue wavier evaluations discussed in SLRA Section 4.3.2.

Request:

1. Clarify the following: (1) whether the existing fatigue wavier evaluations for the head cooling spray and instrumentation nozzles and vent nozzle are based on the original design transient cycles described in SLRA Table 4.3.1-1; and (2) how the Fatigue Monitoring AMP can manage the effects of cumulative fatigue damage in relation to the fatigue waiver evaluations for these nozzles.
2. Clarify whether the following non-USAR-listed transients have an impact on the existing fatigue wavier evaluations discussed in SLRA Section 4.3.2: (1) “sudden start” transient; (2) “hot standby with drain shutoff” transient; (3) “core spray injection” transient; and (4) “operating basis earthquake (OBE)” transient. If so, discuss the impact on the validity of the fatigue waiver evaluations. If not, provide the technical basis for why these transients do not have an impact on the validity of the fatigue waiver evaluations in SLRA Section 4.3.2.

RAI 4.3.6-1

Regulatory Basis:

Pursuant to 10 CFR 54.21(c), the SLRA must include an evaluation of time-limited aging analyses (TLAAs). The applicant must demonstrate that (i) the analyses remain valid for the period of extended operation, (ii) the analyses have been projected to the end of the period of extended operation, or (iii) the effects of aging on the intended function(s) will be adequately managed for the period of extended operation.

Background:

SLRA Section 4.3.6 addresses the fatigue TLAA for ASME Code Section III Class 2 and 3 and ANSI B31.1 piping systems. Specifically, SLRA Table 4.3.6-1 describes the 40-year full range transient cycles for non-Class 1 piping systems and extrapolates the 40-yer cycles to estimate the 80-year projected cycles. In turn, the 80-year cycle numbers are compared to the 7000 cycle limit in the implicit fatigue analysis.

Issue:

However, LRA Table 4.3.6-1 does not clearly describe how the applicant determined the 40-year cycles that were used in the 80-year cycle projections for non-Class 1 fatigue analysis (e.g., based on piping system design specification and information, plant operation procedures, test requirements, USAR information and specific system-level knowledge).

SLRA Table 4.3.6-1 also includes the following 40-year design cycles: (1) 1500 cycles for the feedwater piping; (2) 532 cycles for the nuclear boiler system; and (3) 205 cycles for the reactor recirculation system. The staff needs clarification on whether these cycles were estimated by summing up two or more design cycles for each of the piping systems.

Request:

1. Clarify how the applicant determined the 40-year cycles that were used in the 80-year cycle projections for non-Class 1 fatigue analysis (e.g., based on piping system design specification and information, plant operation procedures, test requirements, USAR information and specific system-level knowledge)
2. Clarify whether the following 40-year design cycles were estimated by summing up two or more design cycles for each of the non-Class 1 piping systems: (1) 1500 cycles for the feedwater piping; (2) 532 cycles for the nuclear boiler system; and (3) 205 cycles for the reactor recirculation system. If so, describe those design cycles for each piping system.

RAI 4.3.7-1

Regulatory Basis:

Pursuant to 10 CFR 54.21(c), the SLRA must include an evaluation of time-limited aging analyses (TLAAs). The applicant must demonstrate that (i) the analyses remain valid for the period of extended operation, (ii) the analyses have been projected to the end of the period of extended operation, or (iii) the effects of aging on the intended function(s) will be adequately managed for the period of extended operation.

Background:

SLRA Section 4.3.7 addresses the EAF TLAA, including the EAF screening evaluation to determine the limiting EAF locations.

SLRA Section 4.3.7 indicates that, after the screening evaluation, the applicant removed the conservatism associated with the screening environmental cumulative usage factor (CUF_{en}) values in more detailed EAF evaluation to determine the refined CUF_{en} values for 80 years of operation, as described in SLRA Table 3.4.7-1.

Issue:

However, the SLRA does not clearly describe how the conservatism was removed from the screening CUF_{en} values to determine the 80-year projected CUF_{en} values.

Request:

Describe how the applicant refined the screening CUF_{en} values to determine the CUF_{en} values listed in SLRA Table 3.4.7-1 and the technical basis of the refinement. If the refinement of the screening CUF_{en} values relied on code provisions such as ASME Code provisions, describe specific references to the code provisions.

RAI 4.3.7-2

Regulatory Basis:

Pursuant to 10 CFR 54.21(c), the SLRA must include an evaluation of time-limited aging analyses (TLAAs). The applicant must demonstrate that (i) the analyses remain valid for the period of extended operation, (ii) the analyses have been projected to the end of the period of extended operation, or (iii) the effects of aging on the intended function(s) will be adequately managed for the period of extended operation.

Background:

SLRA Section 4.3.7 addresses the environmentally-assisted fatigue (EAF) TLAA. The SLRA section indicates that the EAF screening evaluation to determine the limiting locations (also called sentinel locations) uses bounding environmental fatigue correction factor (F_{en}) based on material types.

Issue:

However, SLRA Section 4.3.7 not clearly describe how the applicant calculated the bounding F_{en} values.

Request:

1. Describe how the applicant calculated the bounding F_{en} values in terms of determining the (1) strain rate, (2) sulfur content for carbon and low alloy steels and (3) dissolved oxygen in the reactor coolant as the input to the F_{en} calculations. As part of the response, provide the technical basis for the bounding nature of the F_{en} values.
2. Clarify whether the maximum temperature referenced in relation to the F_{en} calculations (in the first sentence on SLRA page 4.3-19) means the maximum service temperature of each component.

RAI 4.3.7-3

Regulatory Basis:

Pursuant to 10 CFR 54.21(c), the SLRA must include an evaluation of time-limited aging analyses (TLAAs). The applicant must demonstrate that (i) the analyses remain valid for the period of extended operation, (ii) the analyses have been projected to the end of the period of extended operation, or (iii) the effects of aging on the intended function(s) will be adequately managed for the period of extended operation.

Background:

SLRA Section 4.3.7 addresses the EAF TLAA. The SLRA section indicates that the limiting locations described in NUREG/CR-6260 for older vintage General Electric boiling water reactor (BWR) plants are evaluated in the EAF analysis. The locations in NUREG/CR-6260 include the recirculation outlet nozzle, as indicated in the SLRA.

Issue:

SLRA Section 4.3.7 does not list the recirculation outlet nozzle as one of the NUREG/CR-6260 locations. Instead, the SLRA section identifies the recirculation outlet nozzle location as one of the additional plant-specific evaluation locations subject to EAF screening. The SLRA explains that the recirculation outlet nozzle is screened out because its bounding screening CUF_{en} (also called screening U_{en}) is less than the screening threshold of 1.0.

However, it is not clear to staff whether the screening evaluation of the recirculation outlet nozzle includes both the nozzle body and the adjacent piping location (e.g., safe end or safe end weld). In addition, the SLRA does not clearly discuss whether the recirculation outlet nozzle body is bounded by the recirculation inlet nozzle body or other reactor pressure vessel nozzle bodies.

Request:

1. Clarify whether the screening evaluation of the recirculation outlet nozzle includes both the nozzle body and the adjacent piping location (e.g., safe end or safe end weld). If not, provide justification for why the screening evaluation for EAF does not include both the nozzle body and the adjacent piping location (e.g., safe end or safe end weld). As part of the response, describe the fabrication materials of the nozzle body and the adjacent safe end and weld as baseline information.
2. Clarify whether the recirculation outlet nozzle body is bounded by the recirculation inlet nozzle body or other reactor pressure vessel nozzle bodies in the EAF analysis and the basis of the determination. If not, provide the following information for the recirculation outlet nozzle body, consistent with the information in SLRA Table 4.3.7-1: (1) 80-year projected CUF; (2) F_{en}; and (3) 80-projected CUF_{en}.

RAI 4.3.7-4

Regulatory Basis:

Pursuant to 10 CFR 54.21(c), the SLRA must include an evaluation of time-limited aging analyses (TLAAs). The applicant must demonstrate that (i) the analyses remain valid for the period of extended operation, (ii) the analyses have been projected to the end of the period of

extended operation, or (iii) the effects of aging on the intended function(s) will be adequately managed for the period of extended operation.

Background:

SLRA Section 4.3.7 addresses the EAF TLAA, including the EAF screening evaluation to determine the limiting EAF locations (also called sentinel EAF locations).

Issue:

However, the LRA does not clearly describe the following items related to the screening evaluation: (1) how the applicant determined thermal zones or sections that group certain components and piping lines for proper comparisons of the screening CUF_{en} values considering the applicable transient conditions; (2) whether the limiting EAF location is determined for each material type (e.g., stainless steel, nickel alloy, and carbon/low alloy steel); and (3) how the applicant compared the highest values of the screening CUF_{en} values to determine the final limiting locations (e.g., how the limiting locations were determined when the highest CUF_{en} values are close to each other in a thermal zone).

Request:

Describe the following items regarding the EAF screening evaluation: (1) how the applicant determined thermal zones or sections that group certain components and piping lines for adequate comparisons of the screening CUF_{en} values considering the applicable transient conditions; (2) whether the limiting EAF location is determined for each material type (e.g., stainless steel, nickel alloy and carbon steel); and (3) how the applicant compared the highest values of the screening CUF_{en} values to determine the final limiting locations (e.g., screening process when the highest CUF_{en} values are close to each other in a thermal zone). As part of the response, discuss the technical basis of the applicant's approach for the items discussed above.

RAI B.2.2.1-1

Regulatory Basis:

Pursuant to 10 CFR 54.21(a)(3), the SLRA must demonstrate that the effects of aging for structures and components will be adequately managed so that the intended function(s) will be maintained consistent with the current licensing basis for the subsequent period of extended operation.

Background:

In its supplement, enclosure 18 dated June 26, 2023 (ADAMS Accession No. ML23177A218), the applicant indicated that flexible power operation at MNGP started in 2019 and that the flexible power operation includes reducing power to 80 percent, allowing for windmills to operate when wind generation is predicted to be greater than demand. The applicant also explained that the flexible power operations and load-following changes in reactor power have minor impact on temperature (less than 50 °F) and pressure and have negligible impact on fatigue analyses.

Issue:

In the supplement, the applicant did not clearly discuss the basis for the determination that the flexible power operations and the associated load-following changes have negligible impact on fatigue analyses and, therefore, cycle counting is not needed.

Request:

Provide the following information to clarify the technical basis of the applicant's determination that the flexible power operations have negligible impact on fatigue analyses: (1) pressure variation in the flexible power operation; (2) whether the temperature and pressure variations associated with the flexible power operation result in cyclic stresses below the fatigue endurance limit for the reactor coolant pressure boundary components and piping; and (3) if the answer to item (2) above is no, additional information to demonstrate that the flexible operation cycles have negligible impact on the cumulative usage factor (CUF) of reactor coolant pressure boundary components and piping (e.g., bounding CUF contribution of a flexible operation cycle and the total number of flexible operation cycles for 80 years of operation to confirm that the total CUF contributions are negligible).

RAI 2.3.3.14-1

Regulatory Requirements:

10 CFR 54.4 *Scope* reads in part:

(a) Plant systems, structures, and components within the scope of this part are--

…

(2) All nonsafety-related systems, structures, and components whose failure could prevent satisfactory accomplishment of any of the functions identified in paragraphs (a)(1)(i), (ii), or (iii) of this section

Guidance Documents:

NUREG-2192, *"Standard Review Plan for Review of Subsequent License Renewal Applications for Nuclear Power Plants"*,

NEI 95-10, "*Industry Guideline For Implementing The Requirements of 10 CFR Part 54 – The License Renewal Rule"*; Revision 6, Appendix F

Issue:

SLRA Section 2.1.4.2.2, "*Non-Safety Related SSCs Directly Connected to Safety-Related SSCs that Provide Structural Support for the Safety-Related SSCs"* states in part:

*"*For NSR SSCs directly connected to SR SSCs, the in-scope boundary for SLR extends into the NSR portion of the piping and supports up to and including the first equivalent anchor beyond the safety/non-safety interface."

SLRA Section 2.3.3.14, "*Reactor Building Closed Cooling Water"* describes the results of scoping and screening of the Reactor Building Closed Cooling Water.

NUREG-2192, Section 2.1.3.1.2 *Nonsafety-Related* states in part:

"In order to comply, in part, with the requirements of 10 CFR 54.4(a)(2), all applicants must include in scope all nonsafety-related piping attached directly to safety-related piping (within the scope of SLR) *up to a defined anchor point consistent with the plant CLB.* This anchor point may be served by a true anchor (a device or structure which ensures forces and moments are restrained in three (3) orthogonal directions) or an equivalent anchor, such as a large piece of plant equipment (e.g., a heat exchanger,) determined by an evaluation of the plant-specific piping design (i.e., design documentation, such as piping stress analysis for the facility). Applicants should be able to define an equivalent anchor consistent with their CLB (e.g., described in the UFSAR or other CLB documentation), which is being credited for the 10 CFR 54.4(a)(2) evaluation, and be able to describe the SCs that are part of the nonsafety-related piping segment boundary up to and including the anchor point within the scope of SLR."

NEI 95-10, Revision 6, Appendix F [page F-4] Section 2, "*Discussion"* states in part:

"When demonstrating that failures of non safety-related SSCs would not adversely impact on the ability to maintain intended functions, a distinction must be made between non safety-related SSCs that are connected to safety-related SSCs and those that are not connected to safety-related SSCs. *For a non safety-related SSC that is connected to a safety-related SSC, the non safety-related SSC should be included within the scope of license renewal up to the first seismic anchor past the safety/non-safety interface."*

Scoping/Screening Boundary Drawing SLR-36042-2 *Reactor Building Cooling Water System* [M-111-1] displays piping inside Containment from Penetrations X-24(Coordinate C-8) & X-23 (Coordinate C-3) that is color coded as *a(2) Spatial/Structural* . The structural supports inside containment associated with this piping versus the leakage boundary spatial concerns are two unique concerns and typically not mutually exclusive.

Request:

It is not clear from the staff's review of this boundary drawing whether the guidance of NUREG-2192 Section 2.1.3.1.2 and NEI 95-10 Appendix F has been met. Staff requests the applicant to confirm the NSR piping connected to Penetrations X-24 & X-23"(and/or other similar as applicable) is seismically supported consistent with the guidance of NUREG-2192 and NEI 95-10, Revision 6 as determined by an evaluation of the plant-specific piping.